

1 Hon. Karen A. Overstreet
2 Chapter 7
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1 UNITED STATES BANKRUPTCY COURT
2 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:
ASAP CORPORATION,
Debtor.

NO. 10-23233
MOTION AND DECLARATION FOR
ORDER FOR RULE 2004
EXAMINATION OF GREENPOINT
PRODUCTS AND SERVICES, INC.

ALAN J. WENOKUR, Attorney for Chapter 7 Trustee Dennis Lee Burman, moves this Court for an Order compelling the examination of GREENPOINT PRODUCTS AND SERVICES, INC., through officer SEAN KOOLEY, regarding the acts, conduct, property, liabilities, and financial condition of the debtor, and any other matter which may affect the administration of the debtor's estate.

This motion is based upon the annexed Declaration of Alan J. Wenokur, F. R. Bankr. P. 2004, and the files and records herein.

DATED this 31st day of March, 2011.

/s/ Alan J. Wenokur

Alan J. Wenokur, WSBA # 13679
Attorney for Trustee

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ALAN J. WENOKUR
ATTORNEY AT LAW
600 STEWART STREET, SUITE 1300
SEATTLE, WASHINGTON 98101
(206) 682-6224
FAX: (206) 624-2631

DECLARATION

ALAN J. WENOKUR declares as follows:

I am the attorney for the Chapter 7 Trustee in this case. I make this statement from my personal knowledge and I am competent to testify.

Prepetition, the Debtor transferred substantially all of its assets to Greenpoint Products and Services, Inc. Sean Kooley is believed to be the vice president of that entity. He is also the signer of the asset purchase and sale agreement with the Debtor, in the capacity as “manager”. The Trustee is investigating the facts surrounding the prepetition transfer, the existence of estate assets, and other issues relevant to estate administration. I received no response to my letter request for information sent to Mr. Kooley. The Trustee desires to get full and complete information from the entity through a formal proceeding and therefore requests an examination under oath.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated March 31, 2011, in Seattle, Washington.

/s/ Alan J. Wenokur

Alan J. Wenokur

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ALAN J. WENOKUR

ATTORNEY AT LAW

ATTORNEY AT LAW

10 STEWART STREET, SUITE 1300
SEATTLE, WASHINGTON 98101

WASHINGTON 98101
(206) 683-6331

(206) 682-6224